Case	5:23-cv-00515-HDV-JPR	Document 67 #:906	Filed 09/10/24	Page 1 of 8	Page ID	
1 2 3 4 5 6 7 8 9	ROB BONTA Attorney General of Call NORMAN D. MORRISON Supervising Deputy Attorney Genera State Bar No. 165302 600 West Broadway, San Diego, CA 92101 P.O. Box 85266 San Diego, CA 92186- Telephone: (619) 738- Fax: (619) 645-2581 E-mail: David.Klehm(Attorneys for Defendant (by and through the Call [erroneously sued as "Stand Michael Bell IN THE	orney General uite 1800 5266 9733 adoj.ca.gov State of Californ ifornia Highway tate of California	n"]	T COURT		
11	IN THE UNITED STATES DISTRICT COURT					
12	FOR THI	E CENTRAL DI	STRICT OF CA	ALIFORNIA		
13						
14			-			
15	EDGAR SOLIS,		5:23-cv-0051	5-HDV-JPR		
16		Plaintiff,	DEFENDAN	NTS' WITNE	SS LIST	
17 18 19 20 21	v. COUNTY OF RIVERS OF CALIFORNIA; SA WALTERMIRE; and I inclusive,	SIDE; STATE LVADOR DOES 1-10, Defendants.	Date: Time: Courtroom: Judge: Trial Date: Action Filed:	October 8, 20 10:00 a.m. 10D The Honoral D. Vera October 29, 2 2/02/2023	ole Hernan	
22		Detendants.				
23						
24	TO ALL PARTIE	S, BY AND TH	ROUGH THE	IR ATTORN	NEY OF	
25	RECORD:					
26	Defendants' Californ	rnia Highway Pa	trol and Michae	el Bell hereby	serves the	
27	following witnesses whi	ch may be called	at during trial,	and as a draft	of	

Defendants' Witness List. Defendants' reserve the right to supplement or amend this list.

5	Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
6	M. Vargas, Lieutenant,	Stationed at San Gorgonio Pass Area	45 minutes	45 min	
7	CHP San	Office, Field			
8	Gorgonio Pass	Operations. Involved in post-shooting			
9		investigation and knowledge of Defendant Bell's			
10	D. Hamis	tactical training. Stationed at San	45 minutes	45 min	1
11	D. Harris, Sergeant, CHP San Gorgonio	Gorgonio Pass Area Office, Field Sergeant	45 minutes	43 11111	
12 13	Pass	and knowledge of Defendant Bell's tactical training.			
14					
15	C. Hamilton, Lieutenant, CHP Border	CHP Critical Incident Investigation Team, Leader. Involved in	1 hour	1 hr	
16	Division CIIT	CHP critical incident investigation of the			
17		incident involving use of force on Plaintiff.			
18	J. Kawanaka, Sergeant, CHP Border	CHP Critical Incident Investigation Team, Lead Administrative	45 minutes	45 min	
19	Division CIIT	Investigator. Involved in CHP critical			
20		incident investigation of the incident			
21		involving use of force on Plaintiff.			
22 23	Daniel Moody, Detective	Riverside County Sheriff Department involved in the	45 minutes	45 min	
24	Detective	subsequent scene control or incident			
25		investigation and plaintiff's blood			
26	J. Manjarrez,	sample. Riverside County	30 minutes	30 min	
27	Detective	Sheriff Department officials. Collected		_	
28		white bag of powdery			

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1	Witness's Name*, Title,	Summary of Testimony/Why	Direct Exam	Cross Exam	Dates of Testimony
2	Name*, Title, Affiliation (If Relevant)	Testimony is Unique	(Hours)	(Hours)	•/
3		substance from plaintiff's car			
4		suspected fentanyl and blood sample.			
5	A. Ditfurth, Deputy	Riverside County Sheriff Department	30 minutes.	30 min	
6	Берису	official involved in			
7		the incident investigation.			
8		Surveillance video from 642 Taschner			
9		Drive and plaintiff's firearm forensic			
10		analysis.			
11	Daniel Cline, Deputy	Riverside County Sheriff Department official involved in	20 minutes	20 min	
12		the incident			
13		investigation,			
14		obtained pictures, DNA swab, and Scanner data.			
15	Jennifer Jernegan,	Riverside County Sheriff Department	20 minutes	20 min	
16	Lead Forensic Evidence	Sheriff Department officials involved in the incident			
17	Supervisor Yesika	investigation. Riverside County	40 minutes	40 min	
18	Alvarado,	Sheriff Department official involved in	10 mmates		
19	Forensic Evidence Technician	the incident investigation.			
20		Captured pictures of scene, bullet holes and			
21		charted plaintiff's firearm.			
22	A. Carey, Forensic	Riverside County Sheriff Department	20 minutes	20 min	
23	Services Bureau	official involved in the incident			
24	Technician	investigation.			
25		Obtained pictures of scene and plaintiff in			
26		hospital and first aid supplies and clothing.			
	Venderfees, Forensic	Riverside County	20 minutes	20 min	
27	Services	Sheriff Department official involved in			
28	Burau	the incident			

1	Witness's Name*, Title, Affiliation (If	Summary of Testimony/Why	Direct Exam	Cross Exam	Dates of Testimony
2	Relevant)	Testimony is Unique	(Hours)	(Hours)	
3	Technician	investigation. Obtained pictures of			
4		pursuit termination at 632 Taschner Drive			
5		and point of rest of			
6		plaintiff's car and carport damage.			
7	Esteban Carranza,	Riverside County District Attorney's	30 minutes	30 min	
8	Investigator	Investigator involved in the criminal			
9		investigation of the			
	J. Gonzalez,	incident. Hemet Police	30 minutes	30 min	
10	Lieutenant	Department Officer responded to the area			
11		where Plaintiff fled			
12		and where shots were fired and involved in			
13		the subsequent scene control or incident			
14	D. Maddox,	investigation. Hemet Police	30 minutes	30 min	
15	Sergeant	Department Officer	30 minutes	JO IIIII	
		responded to the area where Plaintiff fled			
16		and where shots were fired and involved in			
17		the subsequent			
18	G. Gomez,	incident investigation. Hemet Police	20 minutes	20 min	
19	Detective	Department Officer involved in the			
20	17.	incident investigation.	20 : .	20 :	
21	Kristen Steward, M.S.,	Bio-Tox Laboratories Personnel involved in	30 minutes	30 min	
	D-ABFŤ-FT or	the testing and analysis of blood			
22	Erin Crabtrey,	obtained from			
23	MS., D- ABFT-FT-	Plaintiff.			
24	Laboratory Director				
25		Dolina Prantinas	2 hours	1 hr. 15	
26	Greg Meyer, Captain (Ret.)	Police Practices Expert will explain	2 hours	1 hr, 15 min – 1 hr	
27		POST standards from basic law enforcement		30 min	
28		training and use of force tactics			
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Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	applicable to facts of this case.			
Parris Ward, Forensic Video Analyst	Forensic video/audio analyst. Will testify regarding his assessment of BWC footage and security cameras near the shooting location and information that can be derived in relation to incident shooting.	1 hour	45 min	
Ronald Kvitne, M.D.	Board certified orthopedic surgeon medical expert will testify about his review and analysis of plaintiff's medical records as they pertain to Plaintiff's injuries including further treatment.	45 minutes	30-40 min	
Michael Ritter, M.D.	Emergency Medicine expert will testify about his review and analysis of plaintiff's Toxicology drug results positive for methamphetamine and PCP and other medical records pertaining to Plaintiff's injuries.	1 hour	45 min	
Leslie Martinez, Resident at 614 North Hillmer	Resident of the property where the incident occurred who heard yelling and gunshots.	20 minutes	20 min	
Marlene Sue Biggs, Resident at 634 North Hillmer	Resident who observed 2-3 officers chase a male adult and heard gunshots	20 minutes	20 min	
Jose Jesus Rodriguez, Resident 623 North Hillmer Drive	Heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting	20 minutes	20 min	

1	Witness's Name*, Title, Affiliation (If	Summary of Testimony/Why	Direct Exam	Cross Exam	Dates of Testimony
2	Relevant)	Testimony is Unique	(Hours)	(Hours)	
3		and the words "He's			
4		got a gun" followed by numerous gunshots			
5					
	Ana	Heard gunshots and	20 minutes	20 min	
6	Rodriguez, Resident 623	heard suspect run through property			
7	North Hillmer	perimeter and the			
8	Drive	officer chasing after him. Heard shouting			
9		and the words "He's			
		got a gun" followed by numerous gunshots			
10	Liliana	3	20 minutes	20 min	
11	Liliana Rodriguez,	Heard gunshots and heard suspect run	20 minutes	20 min	
12	Resident 623 North Hillmer	through property perimeter and the			
13	Drive	officer chasing after			
		him. Heard shouting and the words "He's			
14		got a gun" followed			
15	Pearo	by numerous gunshots Resident who	20 minutes	20 min	
16	Rodriguez,	provided surveillance	20 mmates	20 111111	
	Resident 603 North Hillmer	video from camera mounted to front of			
17	Drive	residence	20	20	
18	Florina Maria Mandujano,	Resident who provided surveillance	20 minutes	20 min	
19	Resident 603	video from camera			
	North Hillmer Drive	mounted to front of residence			
20	Thomas	Resident who	15 minutes	15 min	
21	Jordan, Resident 603	provided surveillance video from camera			
22	North Hillmer	mounted to front of residence			
23	Drive Richard	Resident who heard a	30 minutes	30 min	
	Contla, Resident 622	crashing sound and observed the suspect			
24	North	jump over an east wall. Then heard one			
25	Taschner Drive	wall. Then heard one of the officers yell,			
26	Diive	"He's got a gun"			
27		followed by numerous gunshots and			
		shouting. Mr. Contla			
28		recognized suspect,			

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1 2	Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony	
3 4 5 6 7 8	Kathy Lynn Cassel, Resident 632 North Taschner Drive	having seen him in the area before the incident. Resident of the area where the suspect collided with the Kia Sorrento causing damage to the Kia, support post for the parking stall awning and block wall	20 minutes	20 min		
9	Dated: September		Respectful	l ly submitted	,	
10 11 12	ROB BONTA Attorney General of California NORMAN D. MORRISON Supervising Deputy Attorney General					
13			David Kl	lehm		
14 15			DAVID KLI Deputy Att	EHM torney Gener	ral	
16		DAVID KLEHM Deputy Attorney General Attorneys for Defendant State of California (by and through the California Highway Patrol) [erroneously sued as "State of California"] and Michael Bell				
17		[erroneously sued as "State of California"]				
18 19	*T 1'			er Berr		
20	*Indicates that witness	will be called only if the need arise	es.			
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CERTIFICATE OF SERVICE

Case Name:	Edgar Solis v. County of Riverside, et al.	No.	5:23-cv-00515-HDV-JPR
•	fy that on <u>September 10, 2024</u> , I electrone Court by using the CM/ECF system	•	iled the following documents with
DEFENDA	NTS' WITNESS LIST		
-	all participants in the case are registered by the CM/ECF system.	ed CM/EC	F users and that service will be
of America th	er penalty of perjury under the laws of the foregoing is true and correct and that the cos Angeles, California.		

/s/ J. Sissov Signature

SD2023800661

J. Sissov Declarant